

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Michael-Angelo Johnson

Case: 2:22-mj-30163
Case No. Assigned To : Unassigned
Assign. Date : 3/29/2022
Description: CMP USA v. JOHNSON
(SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2018 through July 7, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 922(a)(6)
18 U.S.C. § 922(a)(1)(A)

Offense Description

Making false statements during the acquisition of a firearm
Engaging in the business of firearms dealing without a license

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 29, 2022

City and state: Detroit, Michigan


Complainant's signature

Rebecca E. Childs, Special Agent (ATF)
Printed name and title


Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Rebecca E. Childs, being first duly sworn, hereby depose and state the following:

INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been since January 2020. I am currently assigned to the Detroit Field Division, Group I, where I investigate violations of firearms and narcotics laws. I have a Bachelor's degree in Global Security and Intelligence Studies from Embry-Riddle Aeronautical University, and I was previously employed as a Supervisory Transportation Security Officer with the Transportation Security Administration. I graduated from the Federal Law Enforcement Training Center and the ATF Special Agent Basic Training program. During my employment with ATF, I have conducted and/or participated in criminal investigations involving the possession and use of firearms, armed drug trafficking, and criminal street gangs, among other state and federal offenses. In furtherance of these and other investigations, I have obtained numerous federal search warrants including residences, vehicles, social media accounts, iCloud storage, and cellular devices.

2. I based this affidavit on my personal knowledge, interviews conducted by myself and/or other law enforcement agents, communications with others who had personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is for the limited purpose of establishing probable cause and does not contain all facts known to law enforcement regarding this investigation.

3. Probable cause exists that Michael-Angelo JOHNSON (B/M, DOB: XX/XX/1997) knowingly made false statements during the acquisition of firearms, in violation of 18 U.S.C. § 922(a)(6), and probable cause exists that between December 2018 to July 7, 2021, JOHNSON engaged in the business of firearms dealing without a license, in violation of 18 U.S.C. § 922(a)(1)(A).

PROBABLE CAUSE

4. To date, the investigation has revealed that JOHNSON purchased at least 52 firearms (49 of which are handguns) from 9 different Federal Firearms Licensees (FFLs) located within the Eastern District of Michigan from December 2018 to July 2021. A query of the Law Enforcement Information Network (LEIN) reveals that JOHNSON registered only ten (10) of the handguns in Michigan. Of the 49 handguns, JOHNSON transferred one (1) and law enforcement has recovered fifteen (15): the Detroit Police Department (DPD) recovered ten (10),

the Warren Police Department recovered two (2), the Chicago Police Department (CPD) recovered two (2), and the Tampa Police Department recovered one (1).

EXECUTION OF SEARCH WARRANT AT 7xxx CLAYBURN ST.

5. On March 9, 2022, ATF obtained a federal search warrant, Case No. 21-50968-8, signed by U.S. Magistrate Judge, the Honorable Judge Elizabeth A. Stafford, for the search of JOHNSON's residence located at 7xxx Clayburn St., Detroit, MI.

6. On March 10, 2022, at approximately 4:35 A.M., ATF agents and assisting law enforcement executed the federal search warrant for 7xxx Clayburn St., Detroit, MI. During the execution of the warrant, JOHNSON was located and detained.

7. Once the scene was secure, agents and officers search the premises and recovered the following items:

- a. Nineteen (19) pistol sales records, 4 receipts for firearms, and 2 business cards for an FFL. Found in the upstairs bedroom northwest closet.
- b. One (1) Pistol Sale Record for a CZ-USA, Scorpion EVO, 9mm, SN# #084732 located in the upstairs bedroom attic.
- c. One (1) receipt for the purchase of a Taurus Arms G2C, SN# ACB529369, 50 rounds ammunition, and the refund of a Glock Inc. 19, SN# AFD167 from Top Gun Shooting Sports in Taylor, MI. Found in the upstairs bedroom attic in the southeast corner in a white garbage bag.

- d. One (1) Glock 19X, 9mm, SN# BRGC895 pistol box. Found in the upstairs bedroom in a small dresser by the southwest closet.
- e. One (1) Glock G42, SN# ABAG047 pistol box. Found in the upstairs bedroom attic in the southeast corner in a white garbage bag.
- f. One (1) Springfield Armory XDM-9 pistol box bearing SN#BY588935. Found in the upstairs bedroom attic in the southeast corner in a white garbage bag.
- g. One (1) Pistol Sale Record for a Springfield Armory XDM-9, 9mm, SN# #BY588935 and receipt. Located in the upstairs bedroom attic.
- h. One (1) Smith and Wesson, SD40 VE, .40 Caliber, pistol box bearing SN#FWS7241. Found in the upstairs bedroom attic in the southeast corner in a white garbage bag.
- i. Two (2) Pistol Sale Records for a Glock 17, 9mm, SN# #BSHG560 and a receipt for a Smith and Wesson SD40 VE Located in the upstairs bedroom attic.
- j. One (1) Smith and Wesson 40 caliber, 14 round magazine. Magazine was loaded with 9 rounds of 40 caliber ammunition. Found in the upstairs bedroom attic in the southeast corner.
- k. One (1) Apple iPhone. Found in the upstairs bedroom on the bed.

8. JOHNSON was advised of his *Miranda* rights, which he waived, agreeing to speak with agents. JOHNSON stated he and his fiancé reside at the residence and he does not have any firearms. JOHNSON initially said the firearms he purchased were stolen, but after being confronted about lying, JOHNSON changed his statement. I asked JOHNSON if he purchased firearms for anyone else

and JOHNSON stated, “That’s illegal- no. They literally tell you on that little paper that they give you when you buy a gun- no.”

9. When confronted about where the firearms were, JOHNSON explained that he sold the firearms to someone in southwest Detroit. The individual gave him \$1,000.00 USD in exchange for the firearm. I asked JOHNSON how old he was when he purchased the firearm, and JOHNSON responded that he had just turned 21. I asked JOHNSON if the individual probably asked JOHNSON to buy the firearm for him because he was too young to purchase it for himself. JOHNSON indicated that he was probably old enough to buy a rifle. I asked JOHNSON if the firearm he sold to the individual was a handgun and JOHNSON indicated that it was. JOHNSON stated he continued to buy firearms for the individual and others (he didn’t know their names) that stayed in the same house. JOHNSON stated that he did not have the individual’s number in his phone, but that his phone is upstairs and maybe he could pull up his page (referring to his Facebook page). JOHNSON estimated he made approximately \$4,000.00 USD total from selling firearms. JOHNSON sold one firearm to the individual and the rest to about seven other people staying in the same house. JOHNSON stated he sold a few firearms to each person. JOHNSON stated he purchased the firearms from Dearborn Outdoors, Top Gun, Dunham’s, Downriver Guns, a Dunham’s in Farmington Hills, and a gun store in Westland.

TRAINING AND EXPERIENCE

10. On March 28, 2022, I inquired with ATF Industry Operations Investigator Rice who confirmed that that JOHNSON does not have and never has held a Federal Firearms License, which would permit JOHNSON to buy and sell large quantities of firearms for a profit.

11. I received and reviewed the ATF Forms 4473 completed and signed by JOHNSON. An ATF Form 4473 is required for anyone who is purchasing or picking up a firearm from an FFL. The ATF Form 4473 asks the purchaser of a firearm the following question: *“Are you the actual transferee/buyer of the firearm(s) listed on this form? Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you.”* On all of the forms, JOHNSON answered this question, “Yes.” I also observed that on all forms, JOHNSON signed his name certifying his answers are true, correct, and complete. Additionally, JOHNSON signed his name where it states, *“I also understand that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony under federal law, and may also violate state and/or local laws.”*

12. Based on my training and experience, JOHNSON has been purchasing firearms with the intention of reselling them for livelihood and profit without a federal firearms license. I draw this conclusion for the following reasons:

- a. JOHNSON's statements that he sold the firearms to individuals in southwest Detroit, making approximately \$4,000.00 USD in profit;
- b. The quick turnaround of certain firearms from the purchase date by JOHNSON to the date the firearm was recovered by law enforcement;
- c. JOHNSON's knowledge of the ATF Form 4473 and the expressed knowledge of the illegality of purchasing firearms for others; and
- d. JOHNSON not possessing a Federal firearms license.

CONCLUSION

13. Probable cause exists that Michael-Angelo JOHNSON knowingly made false statements during the acquisition of a firearms, in violation of 18 U.S.C. § 922(a)(6), and probable cause exists that between December 2018 to July 7, 2021, JOHNSON engaged in the business of firearms dealing without a license, in violation of 18 U.S.C. § 922(a)(1)(A). Per statements from JOHNSON himself, the firearms he purchased, less two that he claimed were stolen, were sold to others without a license. This would indicated that JOHNSON sold at least fifty firearms for which he claimed to have received \$4,000.00 in profit, thereby engaging in the

business of firearms dealing without a license in violation of 18 U.S.C. § 922(a)(1)(A).

14. The above violations occurred within the Eastern Judicial District of Michigan.

Respectfully submitted,



Rebecca E. Childs, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my
Presence and/or by reliable electronic means.



Hon. Jonathan J.C. Grey
United States Magistrate Judge

Date: March 29, 2022